1	Spencer Fane LLP		
2	Richard F. Holley, Esq. Nevada Bar No. 3077		
3	rholley@spencerfane.com R. McKay Holley, Esq.		
4	Nevada Bar No. 15964 mholley@spencerfane.com		
	300 South Fourth Street, Suite 950		
5	Las Vegas, Nevada 89101-6019 Telephone: 702.408.3400		
6	Facsimile: 702.408.3401		
7	David M. Miller (CO Bar No. 17915)		
8			
9	1700 Lincoln Street, Suite 2000 Denver, Colorado 80203		
10	Telephone: 303.839.3800 Facsimile: 303.839.3838		
11	Attorneys for		
12	Client Name U.S. Eagle Federal Credit Union		
13	UNITED STATES BANKRUPTCY COURT		
14	DISTRICT OF NEVADA		
15	In re:	Case No. 24-51031-hlb Chapter 11	
16	FUTURE LEGENDS 5, LLC,	DECLARATION OF	
17	Debtor.	R. MCKAY HOLLEY	
18		Judge: Hon. Hilary L. Barnes	
19		<u>.</u>	
20	I, R. McKay Holley, declare as follows:		
21	1. I am an attorney duly licensed to practice law in the State of Nevada. I am admitted		
22	to practice law before this Court.		
23	2. I am an attorney with the law firm of Spencer Fane LLP, counsel for U.S. Eagle		
24	Federal Credit Union ("U.S. Eagle"), in the above-captioned case.		
25	3. I am over the age of 18 and am mentally competent, I have personal knowledge o		
26	the facts in this declaration except for those matters stated on information and belief, and as to		
27	those matters, I believe them to be true based on my investigation, and, if called upon to testify		
28	could and would do so.		

4.	I make this declaration in support of U.S. Eagle's Ex Parte Application For Order	
Shortening 7	Γime And Notice Of Hearing On Emergency Motion of U.S. Eagle Federal Credit	
Union For Transfer of Venue Pursuant to 28 U.S.C. § 1412 and Fed. R. Bankr. P. 1014(a)(1) (the		
"Application	1").1	

- 5. Future Legends 5, LLC ("Debtor") claims to own certain real property that generally consists of a sports complex located in Windsor, Colorado (the "Complex").
- 6. The Complex is currently being operated by a receiver who was appointed by the Weld County District Court.
 - 7. Debtor sought bankruptcy relief on October 14, 2024.
- 8. As of the filing of this Declaration, Debtor has not filed its Schedules or Statement of Financial Affairs. Debtor has a pending Motion Pursuant to 11 U.S.C. § 521, Fed. R. Bankr. P. 1007 and Local Rule 1007 for Order Extending Time to File Schedules and Statement of Financial Affairs. *See* ECF No. 10.
- 9. Debtor's List of 20 Largest Unsecured Creditors shows twelve creditors have Colorado addresses, while none of the creditors have a Nevada address. *See* ECF No. 3.
- 10. Upon information and belief, the Debtor does not have any substantial assets or creditors in Nevada and does not conduct any business in Nevada.
- 11. Upon information and belief, the law governing the relationship between the parties is governed by Colorado law.
- 12. Given the developments described above, U.S. Eagle believes that the hearing on the Stay Relief Motion should be expedited pursuant to the instant Application to prevent unnecessary, costly, and duplicative litigation.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 22nd day of October 2024.

/s/ R. McKay Holley R. McKAY HOLLEY

SPENCER FANE LLP
Attorneys at Law

¹ Capitalized terms used but not otherwise defined in this Declaration shall have the meanings ascribed to them in the Application.

CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Spencer Fane LLP and that, on the 22nd day of October 2024, I caused to be served a true and correct copy of DECLARATION OF R. MCKAY HOLLEY in the following manner:

(ELECTRONIC SERVICE) Under Local Rule 5005 of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by that Court's facilities.

[(UNITED STATES MAIL) By depositing a copy of the above-referenced document for mailing in the United States Mail, first-class postage prepaid, at Las Vegas, Nevada, to the parties listed on the attached service list, at their last known mailing addresses, on the date written above.

OVERNIGHT COURIER) By depositing a true and correct copy of the abovereferenced document for overnight delivery via Federal Express, at a collection facility maintained for such purpose, addressed to the parties on the attached service list, at their last known delivery address, on the date written above.

(FACSIMILE) By serving a true and correct copy of the above-referenced document via facsimile, to the facsimile numbers indicated, to those listed on the attached service list, and on the date written above.

/s/ Olivia Swibies
An employee of Spencer Fane LLP

SPENCER FANE LLP